

**Louisiana-Pacific Corporation
Aroostook County
New Limerick, Maine
A-327-70-D-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #3**

After review of the Minor Modification of a Part 70 source application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Louisiana-Pacific Corporation
INITIAL LICENSE NUMBER	A-327-70-A-I
LICENSE TYPE	Minor Modification of a Part 70 source
NAIC CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer
FACILITY LOCATION	240 Station Road, New Limerick, Maine
DATE OF INITIAL LICENSE ISSUANCE	December 19, 2000
DATE OF PART 70 MINOR CHANGE	December 9, 2003
LICENSE EXPIRATION DATE	December 19, 2005

B. Description of Part 70 Minor Modification

LP operates several baghouses at its oriented strand board plant in New Limerick. At the present time, all of the baghouses are vented inside. For insurance purposes and fire safety, LP must vent the dry wafer storage bin baghouse and the flying cut-off saw baghouse outside.

Following the drying process, wafers are separated from the gas stream in two cyclones. Exhaust gases are vented to a wet ESP, through an induced draft fan, and then through an RTO before exiting the atmosphere. The dried wafers are screened to remove fines and then conveyed to two dry wafer storage bins. LP is proposing to replace the existing dry bin baghouse with a larger baghouse located outside the building. The number of pickup points for the dry bin baghouse would increase as a result of this change. Additional pickup points will include the mat formers and the incline conveyor.

The flying cut-off saw cuts formed wafer mats into 16-foot lengths prior to pressing. Wafers, fines and other reject material generated from this process are conveyed to the flying cut-off saw baghouse. LP is proposing to modify the ductwork to vent the exhaust from this baghouse outside the building. In

addition, some of the pickup points for the current flying cut-off saw baghouse will be transferred to the new larger dry bin baghouse.

Engineering testing was conducted for emissions from the outlets of the two existing baghouses associated with the dry wafer storage bins and the flying cut-off saw. Testing was also conducted for methanol and formaldehyde emitted through these baghouses as well. The following table details the proposed emission limits for the dry wafer storage bins and the flying cut-off saw:

	PM/PM ₁₀		VOCs	HAPs
Dry Wafer Storage Bins	0.1 lb/hr	0.5 tons/yr	2.7 tons/yr	2.7 tons/yr
Flying Cut-Off Saw	0.5 lb/hr	2.2 tons/yr	7.4 tons/yr	7.4 tons/yr

The HAPs emitted from these baghouses are also VOCs. The 2.7 tons/year emission rate from the Dry Wafer Storage Bins was derived from a measured HAP/VOC emission rate of 0.492 lb/hr, 8,760 hours of operation and a 25% margin for conservatism. The 7.4 tons/year emission rate from the Flying Cut-Off Saw was derived from a measured HAP/VOC emission rate of 1.347 lb/hr, 8,760 hours of operation and a 25% margin for conservatism.

C. Dry Wafer Storage and Flying Cut-off Saw Baghouses

Streamlining

1. Opacity

- a. MEDEP Chapter 101, Section 2(B)(3)(c) contains the only applicable opacity standard for the baghouses.
- b. BPT also establishes an applicable opacity standard for the baghouses.

LP accepts streamlining for the opacity limits. The BPT limits are more stringent and therefore only the BPT opacity limits are included in this license.

2. Particulate Matter

- a. MEDEP Chapter 105 contains the only applicable PM lb/hr standard for the baghouses.
- b. BPT also establishes an applicable PM/PM₁₀ lb/hr standard for the baghouses.

LP accepts streamlining for the PM/PM₁₀ lb/hr limits. The BPT limits are more stringent and therefore only the BPT PM/PM₁₀ lb/hr limits are included in this license.

3. Volatile Organic Compounds
 - a. BPT establishes the only applicable VOC ton per year emission limit.
No streamlining requested.
4. Hazardous Air Pollutants
 - a. BPT establishes the only applicable HAP ton per year emission limit.
No streamlining requested

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which demonstrates the hours of operation for the dry wafer storage baghouse and the flying cut-off saw baghouse. The hours of operation will be used with a specified emission factor to determine the tons of VOCs and HAPs emitted from each process per calendar year.

Based on best management practices, it is unlikely the dry wafer storage baghouse and the flying cut-off saw baghouse will exceed opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

Based on best management practices, it is unlikely the dry wafer storage baghouse and the flying cut-off saw baghouse will exceed the emission limits for PM/PM₁₀. Therefore, periodic monitoring by the source for this pollutant is not required. However, neither the EPA nor the State is precluded from requesting LP to perform testing and may take enforcement action for any violations discovered.

D. Application Classification

The application for LP does not violate any applicable or state requirement and does not increase the sources potential to emit by significant emissions. This application is not a modification or reconstruction under Section 111 or 112 of the Clean Air Act (CAA) or a Title I modification under the CAA. Therefore, the license amendment is considered to be a Minor Modification of a Part 70 source issued under Section 5 of Chapter 140 of the Department's regulations for a Part 70 source.

E. Revised Facility Emissions

Total Allowable Annual Emissions for the Facility

(used to calculate the license fee)

Pollutant	Tons/Year
PM	156.8
PM ₁₀	156.8
SO ₂	11.7
NO _x	310.7
CO	917.3
VOC	59.2
Total HAPs*	35.25

*HAPs included are: Lead, Arsenic, Benzene, Acetaldehyde, Acrolein, Formaldehyde, Methanol and Phenol

ORDER

The Department hereby grants Part 70 Administrative Revision A-327-70-D-A, subject to the conditions found in Part 70 License A-327-70-A-I, amendment A-327-70-B-M, amendment A-327-70-C-M and in addition to the following conditions:

The following shall replace Condition (43) of Part 70 License A-327-70-A-I:

(43) **Hazardous Air Pollutants**

LP shall limit facility wide HAP emissions to 35.25 tons per calendar year. Compliance shall be based on the following:

HAPS from the Thermal Oil Heaters

Tons of Biomass burned/year in the TOH X 0.05 lb HAP/Ton of Biomass

Plus

Gallons of #2 fuel oil burned/year in the TOH X 2.24×10^{-6} lb HAP/Gallon of oil

Plus

Gallons of waste oil burned/year in the TOH X 0.0275 lb HAP/Gallon of oil

Plus

HAPS from the Dryers

TFP/year X 0.187 lb HAP/ODT X 1.22 ODT/TFP

Plus

HAPS from the Press

TFP/year X 0.012 lb HAP/MSF X 1.6 MSF/TFP

Plus

HAPS from the Dry Wafer Storage Bin

Hours of operation X 0.615 lb HAP/hr

Plus

HAPS from the Flying Cut-Off Saw

Hours of operation X 1.68 lb HAP/hr

Equals Pounds of HAP emitted. Divide by 2000 to get Tons of HAP emitted.

TFP = Tons of Finished Product
ODT = Oven Dried Ton
MSF = 1000 Square Feet

[MEDEP Chapter 140, BPT] **Enforceable by State Only**

The following are new conditions to Part 70 License A-327-70-A-I:

(58) Dry Wafer Storage Bin Baghouse

- A. PM emissions from the Dry Wafer Storage Bin Baghouse shall not exceed 0.1 pounds per hour. Compliance with the PM lb/hr limit shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department.

[MEDEP Chapter 140, BPT]

- B. VOC emissions from the Dry Wafer Storage Bin Baghouse shall be restricted to 2.7 tons per year on a twelve-month rolling average basis. Compliance shall be determined as follows:

$$\text{Tons of VOC / year} = \text{hours of operation per year} \times 0.615 \text{ lb / hr} \div 2,000$$

[MEDEP Chapter 140, BPT]

- C. Visible emissions from the Dry Wafer Storage Bin Baghouse shall not exceed an opacity of 10 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period. LP shall take corrective action if visible emissions from the baghouse exceeds five (5) percent opacity.

[MEDEP Chapter 140, BPT]

(59) Flying Cut-Off Saw Baghouse

- A. PM emissions from the Flying Cut-Off Saw Baghouse shall not exceed 0.5 pounds per hour. Compliance with the PM lb/hr limit shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department.

[MEDEP Chapter 140, BPT]

- B. VOC emissions from the Flying Cut-Off Saw Baghouse shall be restricted to 7.4 tons per year on a twelve-month rolling average basis. Compliance shall be determined as follows:

$$\text{Tons of VOC / year} = \text{hours of operation per year} \times 1.68 \text{ lb / hr} \div 2,000$$

[MEDEP Chapter 140, BPT]

- C. Visible emissions from the Flying Cut-Off Saw Baghouse shall not exceed an opacity of 10 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period. LP shall take corrective action if visible emissions from the baghouse exceeds five (5) percent opacity.

[MEDEP Chapter 140, BPT]

- (60) This amendment shall expire concurrently with Part 70 License A-327-70-A-I.
[MEDEP Chapter 140]

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 10, 2003

Date of application acceptance: October 17, 2003

Date filed with the Board of Environmental Protection _____

This Order prepared by Mark E. Roberts, Bureau of Air Quality.